



DMLIGH@solutia.com on 03/24/2000 10:00:30 AM

To: MICHAEL MCATEER

Subject: Sauget Area I UAO for Sediments removal / containment

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Mike,

Attached is revision to Solutia's March 20 UAO draft pursuant to our conversation concerning the risk based concept; the mitigation plan and the GW monitoring plan:

(Note: On the electronic version, additions are Underlined/Magenta colored. Deletions are strike-through/red colored. On a hard copy, the previous changes will also be underlined and the deleted language will also have a strike-through.)

Comments on this draft:

- 1) Page 1 - Removed the reference to the risk-based approach and returned to the "as necessary language for the "additional areas" to be covered. Note that I have included Site M in the "as -necessary" category. Based on the information we have to date on Site M, the sediment contamination does not appear to be of the same order of magnitude as Sector B.
- 2) Page 10 - Removed the risk-based approach references from the "Work to be Performed" section. Note that Item 8, which deals with the mitigation plan, was struck in the previous draft and I have left it the same in this draft. But the requirement for a mitigation plan IS included within the "Post Closure Requirements" section (page 27 of this draft).
- 3) Page 12 - Removed "Risk Analysis Requirements" from the title of Section 4.
- 4) Page 13 - Removed the newly added section concerning creek bottom soils and risk based action levels.
- 5) Page 13 - Modified Section 5 "Excavated Areas Bottom Liner Requirements to be consistent with deletion of the risk-based concept and substituting of the "as necessary" approach.
- 6) Page 14 - I have not made any changes on this page. But note that although the section on the Groundwater Monitoring on this page was deleted in the previous draft, Groundwater Monitoring is added back in the "Post Closure Requirements" (see page 28).
- 7) Page 27 - "Post Closure requirements" - The Mitigation Plan is added.
- 8) Page 28 - "Post Closure requirements" - Section E - I have not made any

changes - note that the GW monitoring requirements are included.

Mike Light



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